

Jonathan C. Coppom  
Wyoming State Bar No. 7-5548  
Assistant United States Attorney  
District of Wyoming  
P.O. Box 668  
Cheyenne, WY 82003  
(307) 772-2997  
[jonathan.coppom@usdoj.gov](mailto:jonathan.coppom@usdoj.gov)

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**NATHAN GOSENS,**

Defendant.

**Case No. 2:23-CR-00125-ABJ**

---

**GOVERNMENT’S MOTION FOR  
PRELIMINARY ORDER OF FORFEITURE**

---

**COMES NOW THE UNITED STATES OF AMERICA**, pursuant to Fed. R. Crim. P. 32.2(b)(2), and hereby moves this Court to enter a preliminary order of forfeiture as to the Defendant, Nathan Gossens. In support of this motion, the government states as follows:

**I. Procedural Background**

On September 20, 2023, the Defendant was indicted by a grand jury for the District of Wyoming. (Doc. No.10.). In the Indictment, the Defendant was charged with a sole count, Felon in Possession of a Firearm in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8). (*Id.*).

The Indictment also contained a Forfeiture Notice that included any firearms and ammunition, including but not limited to, **(together the “Subject Properties”)**, involved in the commission of the offense charged, namely:

- a Ruger EC9s 9mm pistol bearing serial number 458-60281.

On January 4, 2024, the Defendant entered into a plea agreement with the United States. (Doc. No. 28.). In the plea agreement, the Defendant agreed to plead guilty to the Indictment's sole count, consented to the forfeiture of the Subject Properties listed in the Indictment, and admitted that the Subject Properties were involved in the offense charged in the Indictment (Doc. Nos. 1, 28.).

On January 17, 2024, the Defendant pleaded guilty to the Indictment's sole count. (Doc. Nos. 1, 33.).

Accordingly, the United States now moves pursuant to Fed. R. Crim. P. 32.2(b) and 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and 26 U.S.C. § 5872, for the entry of a Preliminary Order of Forfeiture, forfeiting to the United States the Subject Properties listed in the Indictment (Doc. No. 10.), namely:

- a Ruger EC9s 9mm pistol bearing serial number 458-60281; and
- associated ammunition.

Upon the issuance of a Preliminary Order of Forfeiture, the United States will publish notice of the Order on the government's official Internet website, [www.forfeiture.gov](http://www.forfeiture.gov), and will send direct notice to any person, other than the Defendant, that reasonably appears to have an interest in the Subject Properties, advising such person of his or her right to file a petition contesting the forfeiture in accordance with Fed. R. Crim. P. Rule 32.2(c) and Supplemental Rule G(4) of the Federal Rules of Civil Procedure. This notice will state that the petition shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the property, shall be signed by the petitioner under penalty of perjury, and shall set forth the nature and extent of the petitioner's right, title or interest in the forfeited property and any additional facts supporting the petitioner's claim and the relief sought.

**DATED** this 25th day of January 2024.

Respectfully submitted,

NICHOLAS VASSALLO  
United States Attorney

By: /s/ Jonathan C. Coppom  
JONATHAN C. COPPOM  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

This is to certify that on this 25th day of January 2024, I served a true and correct copy of the foregoing upon counsel via CM/ECF.

/s/ *Kebin Haller*

UNITED STATES ATTORNEY'S OFFICE